

WACHTELL, LIPTON, ROSEN & KATZ  
51 West 52nd Street  
New York, New York 10019  
(212) 403-1000

*Attorneys for Defendants JPMorgan Chase & Co.,  
JPMorgan Chase Bank, N.A., J.P. Morgan Securities LLC  
and J.P. Morgan Securities Ltd.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JPMORGAN CHASE & CO., JPMORGAN  
CHASE BANK, N.A., J.P. MORGAN  
SECURITIES LLC, and J.P. MORGAN  
SECURITIES LTD.,

Defendants.

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11 Civ. 913 (CM)

**JPMORGAN'S MOTION TO DISMISS THE TRUSTEE'S AMENDED COMPLAINT**

TO THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK:

PLEASE TAKE NOTICE that, upon the accompanying Opening Brief in Support of JPMorgan's Motion to Dismiss the Trustee's Amended Complaint; the Declaration of Emil A. Kleinhaus and exhibits thereto; and all the papers filed and proceedings had herein, defendants JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., J.P. Morgan Securities LLC and J.P. Morgan Securities Ltd. respectfully hereby move this Court for an order dismissing with prejudice causes of action 1 through 12 and 21 through 28 of the Amended Complaint filed in this proceeding pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(6) and 9(b).

PLEASE TAKE FURTHER NOTICE that any opposition briefs are due to be filed on or before September 1, 2011, and any reply brief is due to be filed on or before September 16, 2011.

JPMorgan respectfully requests oral argument on its motion to dismiss.

Dated: New York, New York  
August 1, 2011

Respectfully submitted,

WACHTELL, LIPTON, ROSEN & KATZ

*Of counsel:*

Amy R. Wolf  
Douglas K. Mayer  
Stephen R. DiPrima  
Emil A. Kleinhaus  
Meredith L. Turner  
Jonathon R. La Chapelle  
Lauren M. Kofke

By: /s/ John F. Savarese  
John F. Savarese

51 West 52nd Street  
New York, NY 10019  
Telephone: (212) 403-1000  
Facsimile: (212) 403-2000

*Attorneys for Defendants JPMorgan Chase & Co.,  
JPMorgan Chase Bank, N.A., J.P. Morgan Securities  
LLC and J.P. Morgan Securities Ltd.*